

July 16, 2018

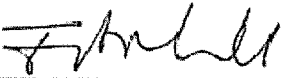
Hon. Paul G. Gardephe
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Mayagüez S.A. v. Citigroup Inc. et al., Case No. 1:16-cv-06788

Dear Judge Gardephe:

We write jointly on behalf of Plaintiff Mayagüez S.A. and Defendants Citigroup Inc. and Citibank, N.A. (together, the "Parties") in the above-referenced action. Pursuant to your Honor's Individual Rules of Practice, the Parties submit this joint letter to respectfully request that the Court enter the proposed Stipulated Protocol for Discovery of Electronically Stored Information, attached hereto as Exhibit A. We thank the Court for its consideration.

Respectfully submitted,



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cc: All Counsel of Record (via ECF)